

AUG 1 1990

LE:P:TE:EMO

Disk L-26:CZEREPAK.DOC:8-1-90  
cc: SAC:RD:DIVISION

Mr. [REDACTED] Czerepak  
[REDACTED]  
Chicago, Illinois 60652

Dear Mr. Czerepak:

This refers to your letter of July 24, 1990, in which you ask about selling MP40 submachinegun receivers which are "80% finished".

We do not make classifications based on the percentage of completeness of a particular item. The terminology "80% finished" is not used by this office.

We have classified certain unfinished receivers as not being firearms. Those unfinished submachinegun type receivers, which have been classified as not being firearms, are solid bars with no internal machining performed. The exterior of the bar has been profiled to the approximate shape of the finished item.

If you plan to sell a solid bar having the exterior profile of an MP40 submachinegun receiver and having no internal machining, the item would not be a firearm. If any additional operations were performed this classification would be subject to review.

We trust that the foregoing has been responsive to your inquiry. If we may be of any further assistance, please contact us.

Sincerely yours,

(Signed) Edward M. Owen, Jr.

Edward M. Owen, Jr.  
Chief, Firearms Technology Branch

CODE	INITIATOR	REVIEWER	REVIEWER	REVIEWER	REVIEWER	REVIEWER	REVIEWER
SUR-NAME							
DATE							

ATF F 1325.6 (2-75)

REPLACES ATF FORM 92 (9-73) WHICH MAY BE USED

CORRESPONDENCE APPROVAL AND CLEARANCE

DEPARTMENT OF THE TREASURY  
BUREAU OF ALCOHOL, TOBACCO AND FIREARMS  
U.S. GPO: 1989-0-228-636

Exhibit "11"

ATF0049